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10 Attorneys for Defendant
11 Novartis Consumer Health, Inc.

12 **UNITED STATES DISTRICT COURT**

13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 Julie Winkelmann, Michelle Cruz, and) Case No. 14-cv-00160-JST
15 Thamar S. Cortina, on behalf of) Hon. Jon S. Tigar
16 themselves and all other similarly situated)
17 individuals,)
18 Plaintiffs,) **STIPULATION TO RESCHEDULE THE**
19 v.) **CASE MANAGEMENT CONFERENCE**
20 Novartis Consumer Health, Inc.,) Current Date: April 23, 2014
21 Defendant.) Proposed Date: May 7, 2014
22)
23)
24)
25)
26)
27)
28)

1 Defendants Novartis Consumer Health, Inc., by and through its undersigned attorneys
2 (“Defendant”), and Plaintiffs Julie Winkelmann, Michelle Cruz, and Thamar S. Cortina, by and
3 through their undersigned attorneys (“Plaintiffs”), hereby stipulate to the following:

4 WHEREAS, on January 10, 2014, Plaintiffs filed a complaint captioned *Winkelmann et al.*
5 v. *Novartis AG et al.*, No. 14-cv-160, a purported class action under Cal. Bus. & Prof. Code
6 § 17200;

7 WHEREAS, on April 3, 2014, Plaintiffs amended their complaint by (1) adding an
8 additional plaintiff and (2) dismissing without prejudice defendants Novartis AG and Novartis
9 Corporation;

10 WHEREAS, pursuant to the January 16, 2014 Case Management Conference Order (Dkt.
11 #10), the Initial Case Management Conference is scheduled for April 23, 2014;

12 WHEREAS lead counsel for Defendant is unable to participate in the Case Management
13 Conference on April 23 as he will be in Philadelphia for a deposition on that date;

14 WHEREAS lead counsel for Defendant and Plaintiffs are able to participate in a Case
15 Management Conference on May 7, 2014;

16 WHEREAS this stipulation is without prejudice to, or waiver of, any rights, arguments, or
17 defenses otherwise available to the parties in this action, including, but not limited to, challenges
18 to jurisdiction or venue.

19 NOW THEREFORE, the undersigned parties, by and though their counsel of record,
20 stipulate as follows:

21 1. The Initial Case Management Conference, currently scheduled for April 23, 2014,
22 is hereby adjourned to May 7, 2014 or such other later date as is convenient for the Court.

23 2. Case Management Statements shall be due ten court days prior to the new Case
24 Management Conference date.

KAYE SCHOLER LLP

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4 Dated: April 4, 2014

KAYE SCHOLER LLP

5 By: /s/ Aton Arbisser
Aton Arbisser

6 Attorneys for Defendant
Novartis Consumer Health, Inc.

7 Dated: April 4, 2014

GIRARD GIBBS LLP

8 By: /s/ Scott Grzenczyk
Scott Grzenczyk

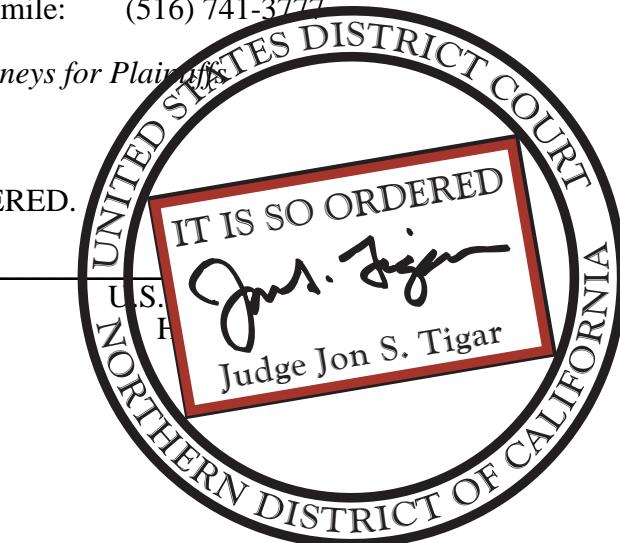
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17 Attorneys for Plaintiffs

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19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 Dated: April 8, 2014



ATTESTATION STATEMENT

Pursuant to Local Rule 5-1(i)(3), I hereby attest that I have received permission from all signatories listed in this document to enter a conformed signature, and have obtained their concurrence in the filing of this document. I further attest that I have on file and will maintain all records to support this concurrence.

Dated: April 4, 2014

KAYE SCHOLER LLP

By: /s/ Aton Arbisser
Aton Arbisser

Attorneys for Defendant
Novartis Consumer Health, Inc.

KAYE | SCHOLER LLP